

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:	:	
Glenn Kovach, Jr.	:	Case No. 19-24028-JCM
	:	Chapter 13
Debtor(s)	:	
	:	
Ronda J. Winnecour, Chapter 13	:	Related to Document
Trustee	:	
Movant(s)	:	
	:	Hearing Date:
vs.	:	
	:	
Glenn Kovach, Jr.	:	
	:	
Respondent(s)	:	

REPLY TO TRUSTEE'S MOTION TO DISMISS

AND NOW, Debtor through their attorney for the Western District of Pennsylvania, reports, as follows:

1. This case was filed on October 15, 2019.
2. Sixty months have elapsed since the petition was filed.
3. The Debtor has paid the approximately \$3,425.00 is necessary to complete the plan and will resumes direct long term debt payments effective January 1, 2025. (See attached)

WHEREFORE, the Debtor requests that this Honorable Court not dismiss the above-caption case.

Respectfully Submitted,

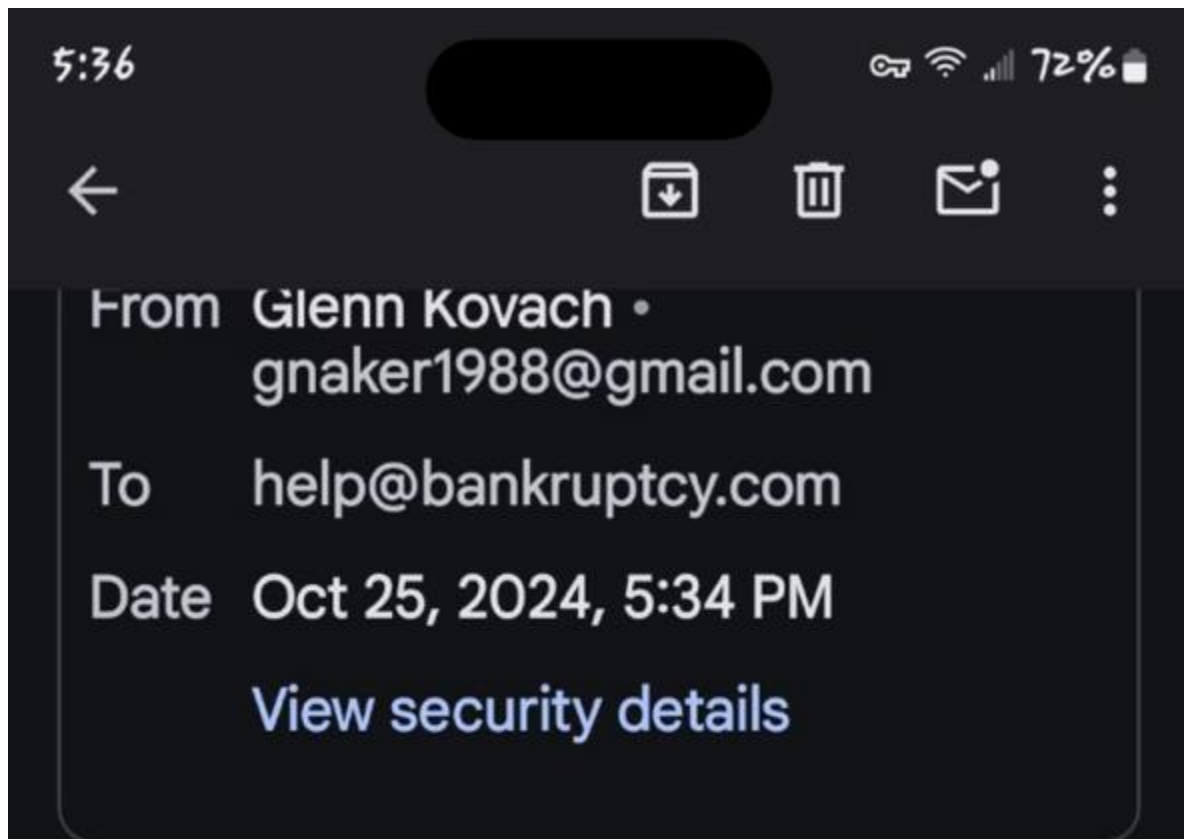
10/28/2024

/s/ Lawrence Willis
Lawrence W. Willis, Esquire
PA 85299
201 Penn Center Blvd., Suite 310
Pittsburgh, PA 15235

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	:	
Glenn Kovach, Jr.	:	
	:	
Respondent(s)	:	

EXHIBIT



A screenshot of a payment confirmation form on a mobile device. The status bar at the top shows the time 5:22, a checkmark icon, and 73% battery. The form includes a promotional banner, input fields for payment amount and case number, and a confirm payment section.

\$2,001 or more \$7.99

Payment Amount

\$ 3,425.00

Confirm Payment Amount

\$ 3,425.00

Case Number

19-24028

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	:	
Glenn Kovach, Jr.	:	
	:	
Respondent(s)	:	

CERTIFICATE OF SERVICE

I hereby certify that on the date shown below, I served a true and correct copy of the Reply to Motion with attached Exhibit upon the following, by electronically

Office of the U.S. Trustee
1000 Liberty Avenue, Suite 1316
Pittsburgh, PA 15222

Glenn Kovach, Jr.
111 Elgin Lane
Evans City, PA 16033

Office of the Chapter 13 Trustee
U.S. Steel Tower – Suite 3250 600 Grant Street
Pittsburgh, PA 15219

10/28/2024
Date

/s/ Lawrence Willis
Lawrence W. Willis, Esquire
201 Penn Center Blvd., Suite 310
Pittsburgh, PA 15235